

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION

BIGFOOT ON THE STRIP, LLC,

Plaintiff,

vs.

RANDY WINCHESTER; and

EMILY WINCHESTER,

Defendants.

Case № 6:18-CV-03155

**NOTICE OF INTENT TO SERVE SUBPOENAS FOR BUSINESS RECORDS**

Pursuant to Fed.R.Civ.Pro. 45(A)(4), defendants herein notify all parties that, unless any party objects to the production of the documents sought by the Subpoenas of Business Records attached hereto, the Subpoenas attached hereto shall be served upon the following:

1. LINDA PETERSON D/B/A LINDA PETERSON DESIGNS, 223 Alabaster Drive, Ozark, MO 65721-7187

**Requested Documents:**

- a. Original digital images of any marketing materials you prepared for Bigfoot on the Strip from January 1, 2016 to the present.
  - b. Correspondence, including electronic correspondence, with Bigfoot on the Strip or any person associated therewith related to marketing for Bigfoot on the Strip from January 1, 2016 to the present.
2. JAMES RILEY HAMILTON D/B/A DIGITAL QUILL STUDIO, 2206 E. Richmond Street, Springfield, MO 65804

**Requested Documents:**

- a. Digital images of any marketing materials (including but not limited to brochures, website content, graphic artwork, etc.) you prepared for Bigfoot on the Strip from January 1, 2016 to the present.
  - b. Correspondence with any person related to marketing for Bigfoot on the Strip from January 1, 2016 to the present.
3. CINDY MERRY MARKETING, LLC, c/o RA Henry V. Griffin, 101 State Drive, P.O. Box 1437, Hollister, MO 65673.

**Requested Documents:**

- a. Digital images of any marketing materials you prepared for Bigfoot on the Strip from January 1, 2016 to the present.

- b. Correspondence with any person related to marketing for Bigfoot on the Strip from January 1, 2016 to the present.
- 4. BRANSON/LAKES AREA CHAMBER OF COMMERCE & CONVENTION AND VISITORS BUREAU, 269 State Hwy. 249, PO Box 1897, Branson, MO 65616

**Requested Documents:**

- a. Correspondence (including electronic correspondence) with Bigfoot on the Strip, including any owners or employees thereof related to Bigfoot on the Strip, from January 1, 2016 to the present.
- 5. VERIZON WIRELESS C/O CT CORPORATION SYSTEM, 120 S. Central Avenue, Clayton, MO 63105

**Requested Documents:**

- a. Phone records from December 1, 2017 through March 30, 2018, showing incoming and outgoing calls for the following phone number: 417-860-7169.

Respectfully submitted,

KECK, PHILLIPS & WILSON, LLC  
3140 E. Division  
Springfield, MO 65802  
417-890-8989 / Fax: 417-890-8990

By /s/ Patricia A. Keck

Patricia A. Keck, #42811 ([pat@kpwlawfirm.com](mailto:pat@kpwlawfirm.com))

and

HINKLE LAW FIRM LLC  
6800 College Boulevard, Suite 600  
Overland Park, Kansas 66211  
913-345-9205/ FAX: 913-345-4832

By /s/ Jennifer R. Johnson

Jennifer R. Johnson, [jjohnson@hinklaw.com](mailto:jjohnson@hinklaw.com)

#59197

Michelle R. Stewart, [mstewart@hinklaw.com](mailto:mstewart@hinklaw.com)

#51737

ATTORNEYS FOR DEFENDANTS

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 26 day of February, 2019, the foregoing *Notice of Intent to Serve Business Records Subpoenas* was filed electronically with the Clerk of the US District Court for the Western District of Missouri; and a service copy was served electronically on the following:

Bryan D. Fisher, #65904 ([bfisher@nnlaw.com](mailto:bfisher@nnlaw.com))  
NEALE & NEWMAN, LLP  
1949 E. Sunshine, Suite 1-130  
Springfield, MO 65808-0327  
417-882-9090 / Fax: 417-882-2529  
*Attorneys for Plaintiff*

/s/ Jennifer R. Johnson  
ATTORNEYS FOR DEFENDANTS